

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND**

In re: )  
 ) Bankr. Case 20-10202  
IVY K. NIMLEY, )  
 ) Chapter 13  
Debtor. )  
 )

**NOTICE OF ASSENT TO CREDITOR'S MOTION TO EXTEND SCHEDULING  
ORDER DEADLINES AND TO CONTINUE EVIDENTIARY HEARING,  
AND MOTION TO REMOVE APRIL 30, 2020 MOTION HEARING FROM THE  
COURT'S CALENDAR**

Creditor ABS Loan Trust II, by and through undersigned counsel, hereby provides notice that Debtor Ivy Nimley assents to Creditor's Motion to Extend Scheduling Order Deadlines and to Continue Evidentiary Hearings [Doc. #38], in reference to the current deadlines in this Court's Pretrial Order entered on March 19, 2020 [Doc. #25]. Based on the assent of Ms. Nimley and for the reasons previously set forth in the motion to extend, the parties request this Court to enter a revised pretrial scheduling order as follows:

Objections Motion for Stay Extension and Debtor's Chapter 13 Plan Filed-	June 16, 2020
Pretrial Statements and Exhibits Filed-	June 16, 2020
Pretrial Conference-	June 22, 2020
Evidentiary Hearings-	July 1, 2020 <sup>1</sup>

The Court's stay order would also be extended past May 18, 2020 to accommodate the continuance of the pretrial deadlines and evidentiary hearings.

<sup>1</sup> Counsel is unavailable the remainder of the week of June 22, 2020 through June 29, 2020 for a scheduled vacation.

*Diane Finkle*

Because Ms. Nimley assents to the relief requested in the motion to extend, the parties further respectfully request the Court to remove the hearing currently scheduled for April 30, 2020 from the Court's motion calendar.

For the forgoing reasons, Creditor ABS Loan Trust II respectfully requests this Honorable Court to grant its motion, extend the deadlines in its Pretrial Order, and continue the evidentiary hearings scheduled in this matter. The parties also request this Court to remove the April 30, 2020 motion hearing from the Court's calendar.

Respectfully submitted,

**ABS LOAN TRUST II,**

By its attorneys,

/s/ Peter F. Carr, II  
Peter F. Carr, II (R.I. Bar #5343)  
Carson M. Shea (R.I. Bar #9744)  
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Dated: April 29, 2020

**ASSENTED-TO:**

/s/ Ivy Numley  
IVY NIMLEY

**CERTIFICATE OF SERVICE**

I, Peter F. Carr, II, Esquire, certify that on April 29, 2020, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), by mail and email to Debtor:

Ivy K. Nimley  
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jwnimley@aol.com

and paper copies mailed via first class mail to those non-registered participants:

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Date: April 29, 2020

/s/ Peter F. Carr, II  
Peter F. Carr, II